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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF MICHAEL A.
WILLIAMS, PH.D.**

1 I, Michael A. Williams, Ph.D., declare and state as follows:

2 1. I am a Managing Director at Berkeley Research Group, LLC. I received my M.A.
3 and Ph.D. degrees in economics from the University of Chicago. I have been retained as an
4 economic consultant by the U.S. Department of Justice, Antitrust Division, the U.S. Federal Trade
5 Commission, and the Canadian Competition Bureau. I have personal knowledge of the facts set
6 forth in this declaration and, if called as a witness, could and would testify competently to such facts
7 under oath.

8 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned
9 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' Opposition to
10 Defendant Meta Platforms, Inc.'s Motion for Summary Judgment.

11 3. Attached hereto is the report I have prepared in connection with this assignment: the
12 Expert Merits Report of Michael A. Williams, Ph.D., dated August 5, 2024 (**Exhibit 1**).

13 4. Attached hereto are the reports I previously prepared for, and were submitted in, the
14 above-captioned litigation: the Expert Report of Michael A. Williams, Ph.D., dated May 24, 2024
15 (**Exhibit 2**) (submitted in support of Advertiser Plaintiffs' Motion for Class Certification at Dkt.
16 795-3), and the Expert Reply Report of Michael A. Williams, Ph.D., dated July 8, 2024 (**Exhibit 3**)
17 (submitted in support of Advertiser Plaintiffs' Reply in Support of their Motion for Class
18 Certification at Dkt. 813-3).

19 5. The attached reports accurately reflect my opinions on the matters contained therein.

20
21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on January 29, 2025, in Emeryville, CA.

23 

24 _____
25 Michael A. Williams, Ph.D.
26
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EXHIBIT 1
[Filed Under Seal]

EXHIBIT 2
[Filed Under Seal]

EXHIBIT 3
[Filed Under Seal]